

1 Arjun Vasan  
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6 Plaintiff in Pro Per  
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10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 **Arjun Vasan,**  
13 Plaintiff and Counter-Defendant

14 vs.

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16 **Checkmate.com, Inc.,**  
17 (dba "Checkmate"),  
18 Defendant and Counterclaimant

19 Case No.: 2:25-cv-00765-MEMF-ASx  
20 Hon. Alka Sagar | DISCOVERY MATTER

21  
22 **DECLARATION OF ARJUN VASAN IN**  
**FURTHER SUPPORT OF PLAINTIFF'S**  
**MOTION TO COMPEL DISCOVERY;**  
**DETERMINE SUFFICIENCY; AND FOR**  
**A PROTECTIVE ORDER PHASING**  
**DISCOVERY (DKT. 113)**

23  
24 Complaint Filed: January 28, 2025  
25 Hearing Date: December 2, 2025  
Hearing Time: 11:00 A.M.  
Courtroom: 540

26 I, ARJUN VASAN, declare:

27 1. I am the Plaintiff in this action. I submit this declaration in further support of my motion  
to compel discovery, determine sufficiency and for a protective order phasing discovery.  
28 I have personal knowledge of the facts herein and could and would testify competently.

1       2. Makitalo ¶ 2 is misleading. During the Rule 26(f) Conference, I insisted I would file the  
2       report as is my right as Plaintiff, while Ms. Makitalo pushed for Checkmate to draft. Only  
3       when counsel agreed to exchange sections at the same time, did I agree to permit  
4       Checkmate to draft the report.

5       3. On August 12, I emailed counsel, requesting Checkmate's sections, and only then did  
6       Ms. Makitalo state that it was her view that I would be unilaterally sending my sections  
7       for it to integrate. That was not what I agreed to, as I noted (in Checkmate's Exs. A-B).

8       4. I repeatedly offered an equitable exchange so neither party would be disadvantaged. I  
9       specified a clear timeline, whereas counsel refused to offer any commitment to when I  
10      would receive the integrated report. This is also clear from Checkmate's Ex. A-B.

11      5. Makitalo ¶¶ 14-20 is at worst a miscommunication, there was no intentional "bait and  
12      switch" on my part. When I said I "plan to seek full bifurcation as well (in other issues),  
13      not just of discovery", I intended that to mean separate trials for the counterclaims, which  
14      is the change I made. The relevant exchange is available in its Exs. G, H and I.

15      6. When Counsel objected about the new section, I reverted the change to avoid dispute—  
16      even though I had stated, in my view, I was going to make that change and they agreed.

17      7. I would not have thought to even mention the incident, which was amongst the milder  
18      disagreements of the day. I certainly would not have dedicated several paragraphs to it.

19      8. I think it is evident from Checkmate's own exhibits, that as a first time pro se litigant,  
20      who had never before completed a Rule 26(f) Report I was conducting myself diligently  
21      and in good faith despite repeated threats from Checkmate counsel to "tell the court" that  
22      I was not cooperating.

23      9. Makitalo ¶ 58, where I stated, "only on this issue", was a reflection of Checkmate's  
24      repeated demand to meet only on its own issues for several previous weeks.

25      10. To avoid burdening the Court, I will not contest each and every line in the Declaration. I  
26      have covered the main points in my brief. Other than for authentication, many of  
27      counsel's statements are misleading and should not be assumed as factually true.

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1       *11. I declare under the penalty of perjury of the Laws of the United States of America that the*  
2       *foregoing statements are true and correct.*

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4       **Executed on:** November 18, 2025

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6       /s/ Arjun Vasan

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8       **In Cerritos, California**

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10      **Arjun Vasan, Plaintiff In Pro Per**

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